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Public Comments on Structure and Practices of Video Relay Service Program: Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities:=======

Title: Structure and Practices of Video Relay Service Program: Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities

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I support this agency?s proposed rule via the Federal Communications Commission to enact further guidelines to implement the ?Twenty-First Century Communications and Video Accessibility Act of 2010? to incorporate non-interconnected VoIP services to fund the Telecommunications Relay Service Fund. The Telecommunications Relay Service Fund as I understand it is currently funded solely by VoIP service customers through their providers as a cost effective alternative to traditional telephone contact that hearing and speech disabled could easily access to reduce communication costs. At the same time, the public also has accessibility to VoIP services through the web but receive it without direct

subscription to the actual supplier of accessibility. These web providers such as Skype provide VoIP but do not contribute to the TRS Fund. There are approximately thirty million citizens in the U.S. with hearing loss and several additional millions of persons with speech disabilities that use the funds from TRS to link communication to family, friends, business etc. who use traditional phones that they are not able to access. The general population also uses these services to communicate with persons who have hearing and speech disabilities as well as the advantage of significantly reducing their cable costs. If usage of VoIP is possible via indirect telecommunication devices, then these amenities, such as Skype via usage of the internet provided by Comast (a company that does not provide VoIP) then they should be required to contribute to this fund that benefits the entire public. Cable and internet subscribers may assume that their service providers will incur higher costs allowing the company to contribute to the TRSF without suffering economic loss, but the contribution factor depends on the company?s end of the year revenues so it would not make sense for them to substantially raise costs for customers to complain. In fact, based on the contribution factor, the more the c